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UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

ANNUAL AUDITED REPORT  
FORM X-17A-5  
PART III

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## FACING PAGE

Information Required of Brokers and Dealers Pursuant to Section 17 of the  
Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING 1/1/2014 AND ENDING 12/31/2014  
MM/DD/YY MM/DD/YY

## A. REGISTRANT IDENTIFICATION

NAME OF BROKER-DEALER:

Commerce Street Capital, LLC

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FIRM ID. NO.

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)

1445 Ross Avenue, Suite 2700

(No. and Street)

Dallas

TX

75202

(City)

(State)

(Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT

Tina Schirle

214-545-6827

(Area Code -- Telephone No.)

## B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report\*

KMPG LLP

(Name -- if individual, state last, first, middle name)

717 N. Harwood, Suite 3100

Dallas

TX

75201

(Address)

(City)

(State)

(Zip Code)

## CHECK ONE:

- ☒ Certified Public Accountant  
☐ Public Accountant  
☐ Accountant not resident in United States or any of its possessions

FOR OFFICIAL USE ONLY

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See section 240.17a-5(e)(2).

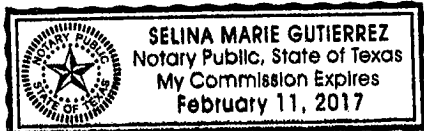
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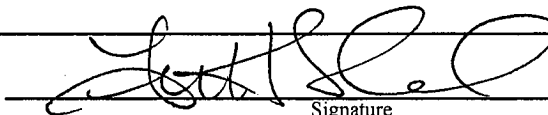
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## OATH OR AFFIRMATION

I, Tina Schirle, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of Commerce Street Capital, LLC, as of 31-Dec, 2014, are true and correct. I further swear (or affirm) that neither the company nor any partner, proprietor, principal officer or director has any proprietary interest in any account classified solely as that of a customer, except as follows:



  
Notary Public

  
Signature

CFO

Title

This report\*\* contains (check all applicable boxes):

- ☒ (a) Facing page.
- ☒ (b) Statement of Financial Condition.
- ☐ (c) Statement of Income (Loss).
- ☐ (d) Statement of Changes in Financial Condition.
- ☐ (e) Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietor's Capital.
- ☐ (f) Statement of Changes in Liabilities Subordinated to Claims of Creditors.
- ☐ (g) Computation of Net Capital.
- ☐ (h) Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
- ☐ (i) Information Relating to the Possession or control Requirements Under Rule 15c3-3.
- ☐ (j) A Reconciliation, including appropriate explanation, of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
- ☐ (k) A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation.
- ☒ (l) An Oath or Affirmation.
- ☐ (m) A copy of the SIPC Supplemental Report.
- ☐ (n) A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit, pursuant to Rule 171-5.

\*\*For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

**COMMERCE STREET CAPITAL, LLC**  
STATEMENT OF FINANCIAL CONDITION  
AND  
REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM  
DECEMBER 31, 2014

# COMMERCE STREET CAPITAL, LLC

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KPMG LLP  
Suite 3100  
717 North Harwood Street  
Dallas, TX 75201-6585

## Report of Independent Registered Public Accounting Firm

Those Charged with Governance  
Commerce Street Capital, LLC:

We have audited the accompanying statement of financial condition of Commerce Street Capital, LLC as of December 31, 2014. This financial statement is the responsibility of the Company's management. Our responsibility is to express an opinion on this financial statement based on our audit.

We conducted our audit in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statement. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statement referred to above presents fairly, in all material respects, the financial position of Commerce Street Capital, LLC as of December 31, 2014, in conformity with U.S. generally accepted accounting principles.

*KPMG LLP*

Dallas, Texas  
February 25, 2015

# COMMERCE STREET CAPITAL, LLC

## STATEMENT OF FINANCIAL CONDITION

December 31, 2014

### ASSETS

Cash and cash equivalents	\$ 1,040,236
Accounts receivable, net of allowance of \$223,811	979,500
Due from affiliates	4,037,691
Furniture and equipment, net of accumulated depreciation of \$309,190	43,702
Prepaid expenses	<u>139,681</u>
	<u>\$ 6,240,810</u>

### LIABILITIES AND MEMBER'S CAPITAL

#### Liabilities

Deferred rent	\$ 268,084
Accrued commissions	325,218
Other liabilities	<u>93,890</u>
Total liabilities	687,192

#### Member's Capital

<u>5,553,618</u>
<u>\$ 6,240,810</u>

See accompanying notes to financial statement.

# COMMERCE STREET CAPITAL, LLC

## NOTES TO FINANCIAL STATEMENT

December 31, 2014

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### 1. Nature of Business and Summary of Significant Accounting Policies

#### *Nature of Business*

Commerce Street Capital, LLC (the "Company") is a limited liability company organized under the laws of the state of Texas on January 18, 2007. The Company is a wholly owned subsidiary of Commerce Street Holdings, LLC ("CSH"). CSH is a multi-member LLC.

The Company is a registered broker-dealer with the Securities and Exchange Commission ("SEC") and is a member of the Financial Industry Regulatory Authority ("FINRA"). The Company's primary business consists of several types of financial services, including investment banking, financial advisory, and underwriting and agency transactions. The Company introduces its customers on a fully disclosed basis and clears all of its transactions through Raymond James & Associates, Inc. Accordingly, the Company operates under exemptive provisions of the SEC Rule 15c3-3(k)(2)(ii).

#### *Basis of Presentation*

The financial statement has been prepared in conformity with accounting principles generally accepted in the United States of America ("GAAP").

The financial statement was approved by management and available for issuance on February 25, 2015. Subsequent events have been evaluated through this date.

#### *Cash and Cash Equivalents*

The Company considers its investments in short-term money market accounts to be cash equivalents. Money market funds are usually securities categorized in the fair value hierarchy as level 1 assets. At December 31, 2014, the Company had approximately \$940,000 in cash and approximately \$100,000 in cash equivalents. Cash equivalents are pursuant to the deposit with the Company's clearing broker.

#### *Furniture and Equipment*

Furniture and equipment are stated at cost less accumulated depreciation. Depreciation is provided using the straight-line method over the estimated useful lives of the assets, generally three to seven years.

#### *Income Taxes*

The Company is a single member limited liability company and thus is treated as a disregarded entity for income tax reporting purposes. All the tax on income or loss of the Company is borne by its member. Accordingly, the Company has not provided for federal income taxes.

At December 31, 2014, management has determined that the Company had no uncertain tax positions that would require financial statement recognition. This determination will always be subject to ongoing reevaluation as facts and circumstances may require. The Company remains subject to U.S. federal and state income tax audits for all periods subsequent to 2011.

# COMMERCE STREET CAPITAL, LLC

## NOTES TO FINANCIAL STATEMENT

December 31, 2014

### 1. Nature of Business and Summary of Significant Accounting Policies (continued)

#### *Use of Estimates*

The preparation of financial statement in conformity with GAAP requires the Company's management to make estimates and assumptions that affect the amounts disclosed in the financial statement. Actual results could differ from those estimates.

### 2. Accounts Receivable

The Company's accounts receivable are balances due from customers for products, services, and solutions provided. Accounts receivable are generally due upon receipt. Account balances outstanding longer than the contractual payment terms are considered past due. The Company reviews its aged receivables by considering several factors, including the aging of the past due balance, the customer's payment history, and the Company's previous loss history. The Company records an allowance for any balances that are deemed to be uncollectible. As of December 31, 2014, an allowance of approximately \$224,000 was recorded in the financial statement.

An analysis of the allowance for doubtful receivables for the year ended December 31, 2014 is as follows:

Beginning of year	\$ 207,005
Additions	16,806
End of year	<u>\$ 223,811</u>

### 3. Due From Affiliates

The Company's member is CSH. The members of CSH are also members of Commerce Street Investment Advisor, LLC (dba Commerce Street Investment Management) ("CSIA"), Service Equity Management, LLC ("SEM") and Commerce Street Capital Management, LLC ("CSCM"). The Company shares employees, retail space as well as normal operating contracts and vendor relationships with CSH, CSIA, SEM and CSCM. As of December 31, 2014, CSC has approximately \$4,038,000 due from affiliates. These related party receivables will be paid through cash or non-cash transactions between related parties as directed by the members of CSH.



# COMMERCE STREET CAPITAL, LLC

## NOTES TO FINANCIAL STATEMENT

December 31, 2014

### 4. Furniture and Equipment

Furniture and equipment as of December 31, 2014, is as follows:

	<u>Acquisition Cost</u>	<u>Accumulated Depreciation</u>	<u>Net Book Value</u>
Computers and related equipment	\$ 222,804	\$ (206,678)	\$ 16,126
Furniture and fixtures	130,088	(102,512)	27,576
	<u>\$ 352,892</u>	<u>\$ (309,190)</u>	<u>\$ 43,702</u>

An analysis of the accumulated depreciation for the year ended December 31, 2014 is as follows:

Beginning of year	\$ 280,023
Depreciation expense	29,167
End of year	<u>\$ 309,190</u>

### 5. Net Capital Requirement

The Company, as a member of FINRA, is subject to the Securities and Exchange Commission Uniform Net Capital Rule 15c3-1. This Rule requires the maintenance of minimum net capital and that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1 and that equity capital may not be withdrawn or cash dividends paid if the resulting net capital ratio would exceed 10 to 1. At December 31, 2014, the Company's net capital was approximately \$351,000, which was approximately \$251,000 in excess of its minimum requirement of \$100,000. The Company's ratio of aggregate indebtedness to net capital was 1.96 to 1.

### 6. Exemption from Rule 15c3-3

The Company is exempt from the Securities and Exchange Commission Rule 15c3-3 and, therefore, is not required to maintain a "Special Reserve Bank Account for the Exclusive Benefit of Customers".

### 7. Concentrations of Credit Risk

The Company maintains its cash balances in various financial institutions. These balances are insured by the Federal Deposit Insurance Corporation ("FDIC") for up to \$250,000 per institution or the Securities Investor Protection Corporation ("SIPC") for up to \$500,000 per institution which includes a \$250,000 limit for cash. As of December 31, 2014, approximately \$690,000 of the Company's cash was in excess of the FDIC insurance limits. As of December 31, 2014, the Company had no cash equivalents in excess of the SIPC insurance limits.

# COMMERCE STREET CAPITAL, LLC

## NOTES TO FINANCIAL STATEMENT

December 31, 2014

### 8. Commitments and Contingencies

The Company, CSIA and CSCM have entered into a lease agreement commencing January 1, 2011 to lease its office facilities for its main office. This is a non-cancelable lease which expires July 14, 2022. Under the terms of the lease, payments escalate annually based on a predetermined payment schedule. The effects of the escalated rent payments and all other terms of the lease are being captured to ensure that rent is reported on a straight line basis over the life of the lease. In addition, during 2014, the Company entered into a one year lease agreement for a small office in New York City.

The following is a schedule of the approximate future minimum lease payments required under the leases:

2015	\$ 417,000
2016	510,000
2017	515,000
2018	521,000
2019	544,000
Thereafter	1,415,000
	<u>\$ 3,922,000</u>

Based on the allocation of certain joint expenses for the year beginning January 1, 2015, the Company expects to share approximately 24% of the above lease commitments with CSIA and CSCM.

### 9. Guarantees

In accordance with accounting guidance, guarantees include contracts that contingently require the guarantor to make payments to the guaranteed party based on another entity's failure to perform under an agreement as well as indirect guarantees of the indebtedness of others. In this regard, the Company has agreed to indemnify its clearing brokers for losses that they may sustain from the customer accounts introduced by the Company. As of December 31, 2014, there were no amounts to be indemnified to the clearing brokers for these accounts.